

Judge Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

NO. CR19-041 RSL

DISCOVERY PROTECTIVE ORDER

v.

MURUGANANANDAM ARUMUGAM,
Defendant.

This matter, having come to the Court's attention on the Stipulation for Entry of a Discovery Protective Order submitted by the United States of America and Defendant Murugananandam Arumugam, and the Court, having considered the motion, and being fully advised in this matter, hereby enters the following PROTECTIVE ORDER:

1. Protected Material

The following documents and materials are deemed Protected Material. The United States will make available copies of the Protected Materials, including those filed under seal, to defense counsel to comply with the government's discovery obligations. Possession of copies of the Protected Materials is limited to the attorneys of record, and investigators, paralegals, law clerks, experts, and assistants for the attorneys of record (hereinafter collectively referred to as members of the defense team). This category of Protected Materials will be marked and labeled as "Protected Material":

1 a. Redacted visual images of a minor with the initials K.A. and Child
2 Protective Services Records.

3 2. Scope of Review of Protected Material

4 Defense attorneys of record and members of the defense team may display and
5 review the Protected Material with the Defendant. The attorneys of record and members
6 of the defense team acknowledge that providing copies of the Protected Material to the
7 Defendant and other persons is prohibited, and agree not to duplicate or provide copies of
8 Protected Material to the Defendant and other persons.

9 3. Consent to Terms of Protective Order

10 Members of the defense team shall provide written consent and acknowledgement
11 that they will each be bound by the terms and conditions of this Protective Order. The
12 written consent need not be disclosed or produced to the United States unless requested
13 by the Assistant United States Attorney and ordered by the Court.

14 4. Parties' Reciprocal Discovery Obligations

15 Nothing in this order should be construed as imposing any discovery obligations
16 on the government or the defendant that are different from those imposed by case law and
17 Rule 16 of the Federal Rules of Criminal Procedure, and the Local Criminal Rules.

18 5. Filing of Protected Material

19 Any Protected Material that is filed with the Court in connection with pre-trial
20 motions, trial, sentencing, or other matter before this Court, shall be filed under seal and
21 shall remain sealed until otherwise ordered by this Court. This does not entitle either
22 party to seal their filings as a matter of course. The parties are required to comply in all
23 respects to the relevant local and federal rules of criminal procedure pertaining to the
24 sealing of court documents.

25 6. Non-termination

26 The provisions of this Order shall not terminate at the conclusion of this
27 prosecution.

28 7. Violation of Protective Order

1 Any violation of any term or condition of this Order by the Defendant, his
2 attorney(s) of record, any member of the defense team, or any attorney for the
3 United States Attorney's Office for the Western District of Washington, may be held in
4 contempt of court, and/or may be subject to monetary or other sanctions as deemed
5 appropriate by this Court.

6 If the Defendant violates any term or condition of this Order, the United States
7 reserves its right to seek a sentencing enhancement for obstruction of justice, or to file
8 any criminal charges relating to the Defendant's violation.

9 DATED this 30th day of October, 2019.

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12 ROBERT S. LASNIK
13 United States Magistrate Judge

14 Presented by:

15 /s/ Cecelia Gregson
16 CECELIA GREGSON
17 Special Assistant United States Attorney

18 /s/ Mohammad Ali Hamoudi
19 MOHAMMAD ALI HAMOUDI
20 JESSE CANTOR
21 Assistant Federal Public Defenders
22 Per email authorization
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